

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TARIQ BHATTI)
)
Plaintiff,) C.A. No.: 05-690 (KAJ)
)
)
v.) TRIAL BY JURY DEMANDED
)
)
J.P. MORGAN CHASE, a Delaware)
Corporation,)
)
Defendant.)

AFFIDAVIT OF TARIQ BHATTI

STATE OF NEW YORK) PRIVATE
) SS.
COUNTY OF)

I, Tariq Bhatti, being duly sworn to depose and say as follows:

1. I am the former and last manager of the Foreign Exchange Processing Group of J.P. Morgan Chase, having worked in that position from 2000 through 2001.
2. During my time as manager I had approximately twelve (12) employees who reported directly to me.
3. Upon the consolidation of operations of J.P. Morgan and Chase Manhattan Bank, and the transfer of the Foreign Exchange Operations out of the Delaware office, myself, my direct reports and others had to be redeployed within J.P. Morgan Chase, or find other employment.

4. My manager, Heather Blair, transferred to Private Banking. Based upon my personnel knowledge of her background, she had no prior experience in Private Banking.

5. At least three (3) of my direct reports, Diana Pitts, Steve Godri, and Joseph Saggione were able to be redeployed to Private Banking. Based upon my personal knowledge, as their supervisor, none of those three individuals had prior experience in Private Banking.

6. Several other former employees, in Foreign Exchange also were able find employment in Private Banking, including Elaine Harris, Beverly Dunn and Rosemarie. Based upon my personal knowledge of those individuals, they had no prior experience in Private Banking.



TARIQ BHATTI

SWORN TO AND SUBSCRIBED before me, a Notary Public, of the State and County

aforesaid, this 9 day of November, 2007.

NOTARY PUBLIC



BEVERLY L. FRANASIAK
Notary Public, State of New York
No. 01FR4769164
Qualified in Niagara County
My Commission Expires June 30, 2010

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DATE \t "M/d/yy"11/6/07 TIME \t "h:mm am/pm"11:15 AM

CERTIFICATE OF SERVICE

This certifies that the undersigned served two copies of the attached pleadings by hand delivery to the below-named Counsel, on November 14, 2007:

Teresa A. Cheek, Esquire
Young, Conaway, Stargatt & Taylor
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899

/s/ Melissa A. Chionchio
Melissa A. Chionchio
Secretary to
Gary W. Aber, Esquire